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Attorneys for Defendant
 CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

HASTINGS COLLEGE OF THE LAW, a
 public trust and institution of higher education
 duly organized under the laws and the
 Constitution of the State of California;
 FALLON VICTORIA, an individual; RENE
 DENIS, an individual; TENDERLOIN
 MERCHANTS AND PROPERTY
 ASSOCIATION, a business association;
 RANDY HUGHES, an individual; and
 KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
 FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF SAM DODGE IN
 SUPPORT OF DEFENDANT CITY AND
 COUNTY OF SAN FRANCISCO'S
 OPPOSITION TO PLAINTIFFS' MOTION TO
 ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024
 Time: 2:00 p.m.
 Place: Hon. Jon S. Tigar
 Oakland Courthouse
 Courtroom 6 – 2nd Floor
 1301 Clay Street
 Oakland, CA 94612

Trial Date: Not Set

Attachments: Exhibits A-C

1 I, SAM DODGE, declare:

2 1. I have personal knowledge of the matters stated herein, and if called and sworn as a
3 witness could and would competently testify thereto.

4 **I. Background and Professional Experience**

5 2. I have devoted my entire professional career to addressing poverty and homelessness.

6 3. I am the Director of the Department of Emergency Management's ("DEM") Division
7 of Street Response Coordination, a position I have held since October 2022. My duties include
8 leading interagency teams of participating departments to address and resolve complex and unhealthy
9 conditions by focusing on residential placements for people in crisis. San Francisco's Healthy Streets
10 Operations Center ("HSOC") director reports to me.

11 4. I previously served as the Director of HSOC, a position I was appointed to in
12 September 2021. As Director of HSOC, my duties included leading an interagency team to address
13 and resolve complex and unhealthy conditions by focusing on residential placements for people in
14 crisis. HSOC's primary activity is conducting large encampment field operations.

15 5. Before I was appointed Director of HSOC, I worked at San Francisco's Department of
16 Homelessness and Supportive Housing ("HSH") from April 2021 to September 2021, as Transitional
17 Director and Special Projects Manager. I also worked at the San Francisco Department of Public
18 Works ("DPW") from November 2017 to April 2021, serving as its Homelessness Coordinator. After
19 founding HSH, I served as Deputy Director from August 2016 to October 2017. From November
20 2015 to July 2016, I served as Director of the Mayor's Office of HOPE, coordinating San Francisco's
21 response to homelessness. From November 2014 to November 2015, I served as Deputy Director for
22 Policy at the Mayor's Office of Housing Opportunity, Partnership & Engagement. From February
23 2014 to November 2014, I worked as Program Support Analyst for San Francisco's Department of
24 Public Works, focusing on homeless services.

25 6. For five years, from September 2008 to September 2013, I worked as Associate Staff
26 Analyst for the New York City Department of Homeless Services. In 2011, while in New York, I
27 received a Master's Degree in Public Administration from Columbia University's School of
28 International and Public Affairs.

7. I worked for seven years, from June 2000 to February 2007, as Director of Organizing and Outreach for the Tenderloin Housing Clinic in San Francisco.

II. Healthy Street Operations Center (“HSOC”) Encampment Resolutions

8. As a result of my personal experience working to address homelessness in San Francisco, I am extremely familiar with the conditions that homeless individuals in San Francisco face on the City’s streets, and with the manner in which City outreach workers interact with homeless individuals in San Francisco.

9. San Francisco’s response to homelessness crosses over multiple City departments. We take a coordinated and compassionate services-first approach to the homelessness crisis including through the HSOC program described below.

10. HSOC conducts several homeless encampment resolutions (“HSOC engagement”) each week, typically two engagements per day at least five days per week. The goals of an HSOC engagement are to (1) conduct client outreach, (2) offer client’s services and housing, (3) remove hazardous or abandoned tents, structures, and vehicles, and (4) clean and secure the site after campers relocate.

11. An HSOC team includes multiple departments, such as community paramedics and an Incident Commander from the Fire Department, homeless outreach workers from the SF Homeless Outreach Team (“HOT”) within HSH, clinicians from the Department of Public Health (“DPH”), police officers, street cleaners from DPW, and parking control officers from the Municipal Transportation Agency (“MTA”).

12. In addition to the ongoing collaboration amongst city departments, HSOC has forged working relationships with several Community Benefit District (“CBD”) organizations and neighborhood based outreach programs from local non-profits. CBDs, also known as Business Improvement Districts, are a public-private partnership to fund improvements and get customized support in select neighborhoods in San Francisco. CBDs and neighborhood based outreach programs from local non-profits share updates and concerns regarding street conditions with City employees who work on homelessness issues.

13. Teams that I supervise plan where upcoming HSOC engagements will be held. The schedule aims to prioritize the areas of greatest need in the City, which often includes streets in the Tenderloin.

14. In 2022, HSOC performed 423 resolutions, engaging 4,299 people, and referring 1,268 people to shelter.

15. In 2023, HSOC conducted 483 resolutions, engaging 4,271 people, and referring 1,556 people to shelter. In 2023, 53 of the resolutions were conducted in the Tenderloin. These resolutions engaged 693 people and referred 246 people to shelter.

16. In 2024 from January 1 through April 3, HSOC conducted 170 resolutions, engaging 1,111 people, and referring 336 people to shelter.

17. HSOC engagements are an avenue for shelter placements. All clients at HSOC engagements are contacted to inquire whether they would be interested in shelter. If a client indicates they want shelter, HSH staff confirm the individual is not already housed or sheltered in a City-supported program. A person who is not already housed is matched with a placement. In this way, HSOC supports the City's efforts to reduce the tent count.

18. When a client declines to engage with an HSOC outreach worker or refuses housing, they are given time to pack and leave the area so the area can be cleaned by DPW team members.

19. If a member of the HSOC field team observes criminal activity, the team member informs a police officer on-site, who then develops a plan of action with the Incident Commander.

III. Tent Counts

20. San Francisco performs, or contracts with partners to perform, routine tent counts around the city. The programs I supervise at DEM rely on this information as one factor in determining where to schedule HSOC engagements. A higher tent count in one area as compared to another weighs in favor of scheduling an HSOC resolution in that area.

21. San Francisco makes the historic data from the tent counts publicly available online at: <https://app.powerbigov.us/view?r=eyJrIjoiY2FmZDNiY2ItMjA2OS00YjU5LWFkMDUtODlkNTgyZmQ3MmNhIiwidCI6IjY2ZDVjMmNmLWNIM2UtNDQzZC05YTdmLWRmY2MwMjMxZjczZiJ9>.

1 The website allows users to filter tent count information by month and by neighborhood for more
2 granular statistics.

3 22. The tent count in February 2024, the most recent data available at the time I signed this
4 declaration, shows a total tent count in San Francisco of 385, with a tent count in the Tenderloin of 48.
5 The tent count in the Tenderloin is lower than the tent count in the Mission (63) and Showplace
6 Square (49) neighborhoods. Attached as **Exhibit A** is a true and correct copy of the tent count data
7 from February 2024 sorted by neighborhood.

8 23. As compared to the data six months prior—from July 2023—the City-wide data in
9 February 2024 shows a 37 percent reduction in the total number of tents. This represents the largest
10 reduction in tents in a six-month period since the start of the pandemic. The reduction in tent counts
11 holds true in the Tenderloin as well where the July 2023 count was 70 compared to the count of 48 six
12 months later—a reduction of greater than 30 percent. Attached as **Exhibit B** is a true and correct copy
13 of the tent count data from July 2023 sorted by neighborhood.

14 24. I am informed and believe that Mayor London Breed issued the Proclamation by the
15 Mayor Declaring the Existence of a Local Emergency in response to COVID-19 on February 25, 2020.
16 The January 2020 tent count, which the last available tent count prior to the outbreak of COVID-19,
17 shows a total tent count in San Francisco of 649 tents, with a tent count in the Tenderloin of 103. The
18 tent count in the Tenderloin is lower than the tent count in the Mission (115) and SoMa (115).
19 Attached as **Exhibit C** is a true and correct copy of the tent count data from January 2020 sorted by
20 neighborhood.

21 25. Tent counts are not a perfect mapping to the number of persons experiencing
22 homelessness. For example, a single tent may house multiple people or, as my employees routinely
23 encounter, a person who has a space in City-supported shelter may nevertheless choose to keep a tent
24 on the street.

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26 ///

27 ///

28 ///

/s/ Sam Dodge
SAM DODGE